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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

RAINBOW BUSINESS SOLUTIONS, INC.,  
ET AL.,

Plaintiffs,

v.

MBF LEASING LLC., ET AL.,

Defendants.

CASE NO. CV 10-01993 CW

JOINT STIPULATION PURSUANT TO  
LOCAL CIVIL RULE 6-2(b) TO  
EXTEND TIME TO RESPOND TO  
PLAINTIFFS' MOTION TO COMPEL  
AS MODIFIED

Case No. C 10-1993 CW

JOINT STIPULATION PURSUANT TO LOCAL CIVIL RULE 6-2 TO EXTEND TIME TO RESPOND TO  
PLAINTIFFS' MOTION TO COMPEL AND PLAINTIFFS' MOTION TO SANCTION

WHEREAS, on February 18, 2014, Plaintiffs filed a motion to compel Leasing Defendants (Northern Leasing Systems, Inc., MBF Leasing, LLC, Northern Funding, LLC, SKS Associates, LLC, Jay Cohen, Sara Krieger, Leonard Mezei and Sam Buono) to produce documents in response to Plaintiffs' Third Set of Requests For Production ("Plaintiffs' Motion");

WHEREAS, under the Local Rules, Leasing Defendants' response(s) to Plaintiffs Motions would have been due March 4, 2014;

WHEREAS, the parties, through counsel, previously agreed, via joint stipulation pursuant to Local Civil Rule 6-2(b), to extend Leasing Defendants time to respond to Plaintiffs' Motions from March 4, 2014 to March 18, 2014, and to extend Plaintiffs' time to reply to March 25, 2014 with a hearing on Plaintiffs' Motion set for April 8, 2014;

WHEREAS, the parties, through counsel, continue to meet and confer in good faith to resolve the issues set forth in Plaintiffs' Motion, and have agreed, via joint stipulation pursuant to Local Civil Rule 6-2(b), to further extend Leasing Defendants time to respond to Plaintiffs' Motions from March 18, 2014 to March 28, 2014, and to extend Plaintiffs' time to reply to April 2, 2014 with a hearing on Plaintiffs' Motion set for April 14, 2014;

WHEREAS, one prior extension with respect to Plaintiffs' Motions has been jointly requested as set forth above;

WHEREAS, this schedule will not impact any other scheduled dates;

NOW, THEREFORE, IT IS STIPULATED, by and between the undersigned parties through their respective counsel of record, pursuant to Local Civil Rules 6-1(b) and 2(a), that the Court extend Leasing Defendants' time to respond to Plaintiffs' Motions from March 28, 2014, to March 28, 2014; Plaintiffs shall file and serve their reply by April 2, 2014; and the hearing on Plaintiffs' Motion shall be April 14, 2014 at 2:00 p.m. before Hon. Magistrate Judge Elizabeth Laporte.

DATED: March 18, 2014

Case No. C 10-1993 CW

Respectfully submitted,

**GUTRIDE SAFIER LLP**

/s/ Kristen Simplicio

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Attorneys for Defendants Sam Buono, Jay  
Cohen, Sara Krieger, MBF Leasing, LLC,  
Leonard Mezei, Northern Funding, LLC,  
Northern Leasing Systems, Inc., and SKS  
Associates, LLC

Pursuant to Local Civil Rule 6-2(a), and GOOD CAUSE APPEARING THEREFOR,

1 **IT IS SO ORDERED.**

2 DATED: March 19, 2014

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4 THE HONORABLE ELIZABETH D. LAPORTE  
5 UNITED STATES MAGISTRATE JUDGE  
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